

Northern Trains Limited

Slavery and Human Trafficking Statement

Introduction

Northern Trains Limited (NTL) supports the objectives of the Modern Slavery Act 2015 (“the Act”) of eliminating slavery and human trafficking and makes this statement pursuant to section 54(1) of the Act for the financial year ended 31st March 2020.

The Act requires commercial organisations to publish a statement as to the actions they have taken to detect and deal with acts of modern slavery in their businesses and supply chains. This obligation applies to organisations that carry on business in the UK and which have a total annual turnover in excess of £36million. This statement is therefore made by NTL in accordance with the Act.

Organisation and structure

Northern Trains Ltd is one of the largest Train Operating Companies (TOCs) in the UK, with a large geographical spread covering most of Northern England. Northern Trains plays a vital role in the north of England by connecting tens of thousands of people to work, leisure, education and more every day.

We are a publicly owned subsidiary of DOHL (Department for Transport OLR Holding Limited).

We are a member of the Rail Delivery Group (RDG), which brings together the companies that run Britain’s railway into a single team with one goal - to deliver a better railway for the British public and our communities.

Policies in relation to slavery and human trafficking

NTL’s anti-slavery and human trafficking approach reflects our continued commitment to respect the human rights of those who work on our behalf.

NTL operates a Responsible Procurement Policy, which details our commitments to sustainable and socially responsible procurement. It is included in our tenders and when offering and awarding business to suppliers and is integrated into supplier contracts.

We monitor compliance within our supply chain by reserving the right to visit suppliers’ and sub-contractors’ facilities to audit performance. Furthermore, we reserve the right to audit any tier of our supply chain. Where we find concerns, we work with suppliers to create a corrective action plan for achieving compliance in clearly defined and reasonable timeframes. If non-compliance is deemed serious (for example; a breach of the Modern Slavery Act), we reserve the right to apply sanctions, which can include immediate termination of our business relationship as further set out in relevant contracts.

We also take direction from the RDG, who have a policy function to develop policy and provide responses to government consultations on behalf of the whole industry.

Due diligence and risk assessment

We recognise that NTL has a responsibility to manage the risk of slavery and, or human trafficking taking place within our supply chain. The United Kingdom and the EU have developed a culture of ethical business practice and strong labour regulation. Our suppliers are mostly based within these countries and we have assessed the overall risk for NTL contracting with organisations that engage in slavery or human trafficking as being relatively low.

NTL risk assesses prospective suppliers by requiring, at the outset of the procurement process, confirmation of the steps those suppliers have taken to reduce the risk of slavery and human trafficking.

We intend to continue to mitigate as much risk as possible by procuring under frameworks where it is commercially viable and legislatively possible to do so. For example, we expect to be able to access Crown Commercial Service frameworks, which are tendered under OJEU procurement rules and perform extensive due diligence when vetting prospective suppliers.

We will continue to discuss the Act with our suppliers, and ensure they take proportionate and appropriate action to eradicate modern slavery and human trafficking in their supply chains.

Key performance indicators

KPI's to measure effectiveness of steps being taken include;

- Requesting information from those suppliers identified as medium to high risk as to the steps they have taken to address slavery and human trafficking in the territories in which they operate, including the outcome of any due diligence carried out on their own businesses and high-risk suppliers further down the supply chain.
- Incorporating any relevant procedures into existing NTL policies in order to inform employees of the process to follow where instances of slavery and human trafficking are suspected and to raise awareness and profile of the issue generally across NTL's workforce. Set up a central database for sharing information collected about suppliers' compliance with the Act across NTL.
- Where possible, procure from public sector frameworks.

Training on modern slavery and trafficking

No specific training in relation to modern slavery has been carried out in the last year. There are plans to provide employees with a general awareness of the Modern Slavery Act and our responsibilities as a contracting authority.

Board sign-off

NTL remains dedicated to strengthening its practices to continuously reduce its exposure to slavery and human trafficking risks. We will continue to monitor NTL's supply chain to assess ongoing risks and develop measures to further reduce the risk of slavery and human trafficking taking place within NTL's supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and is reviewed annually. It was approved by the NTL board and signed by the Managing Director. A written copy of this statement will be provided upon request.



Mr Nick Donovan
Managing Director
April 2020